

DOCKET FILE COPY ORIGINAL
ORIGINAL

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)

Federal-State Joint Board on)
Universal Service)

CC Docket No. 96-45

**REPLY OF BELL ATLANTIC¹ TO OPPOSITIONS TO PETITIONS FOR
RECONSIDERATION**

Carriers should not be required to offer toll control service to Lifeline customers.

Most parties that addressed the issue agree that toll blocking is a far more effective way of limiting Lifeline customers' toll usage than is toll control, even if an effective toll control service could be deployed, which it currently cannot.² A toll control service could not limit the ability of a customer to place toll calls in excess of the pre-set amount, because the customer can use dial-around services, credit cards, and 800 services to circumvent any such limitation.³ GTE also

¹ The Bell Atlantic telephone companies ("Bell Atlantic") are Bell Atlantic-Delaware, Inc.; Bell Atlantic-Maryland, Inc.; Bell Atlantic-New Jersey, Inc.; Bell Atlantic-Pennsylvania, Inc.; Bell Atlantic-Virginia, Inc.; Bell Atlantic-Washington, D.C., Inc.; Bell Atlantic-West Virginia, Inc.; New York Telephone Company; and New England Telephone and Telegraph Company.

² *See, e.g.*, Ameritech's Comments on Petitions for Reconsideration and/or Rehearing at 4-6, AT&T Opposition to Petitions for Reconsideration at 24-25, BellSouth Corporation and BellSouth Telecommunications, Inc. Comments On and Oppositions To Petitions for Reconsideration at 10.

³ *See, e.g.* GTE Comments on Petitions for Reconsideration at 15-17 ("GTE"), Opposition of Bell Atlantic to Petitions for Reconsideration at 11-12.

points out that its own limited toll control system would not meet the Commission's requirements,⁴ and Bell Atlantic is not aware of any system that is compatible with its switches that can accurately limit the dollar amount of toll usage in a multi-vendor environment.

Even if the requisite software were to become available, in order to attempt to control toll use an exchange carrier must constantly monitor the dollar amount of a customer's toll calling and block additional calls once a pre-set limit is reached. Even when Bell Atlantic bills for interexchange carriers, it does not continuously monitor the amount of usage but, instead, receives tapes from interexchange carriers several days or weeks after the calls are placed, making continuous monitoring impossible. Therefore, Bell Atlantic would need to take additional steps to apply the customer's billing rate schedule from his or her carrier to current usage in real time.

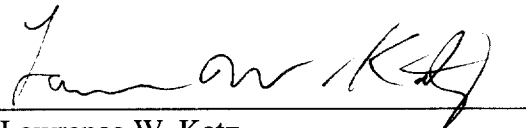
If the customer uses a carrier for which Bell Atlantic does not provide billing, the only way Bell Atlantic could attempt to determine a customer's toll usage would be to try to find sources of information on every rate plan offered by each of the hundreds of interexchange carriers that a customer might use and ask the customer to disclose which rate plan he or she uses. If the customer changes rate plans, Bell Atlantic would need to rely on the customer to remember to inform it of the change. Then Bell Atlantic would need to track continually every rate plan offered by every interexchange carrier and apply the correct rate plan to each

⁴ GTE at 16, n.39. In addition, Bell Atlantic wishes to clarify that, contrary to the Commission's understanding, Bell Atlantic-Pennsylvania, Inc. does not offer, nor does it have the capability of providing, a toll control service that limits the dollar amount of a customer's toll calls. *See Report and Order*, FCC 97-157, n.994 (rel. May 8, 1997).

customer's record. All of this, even if it were technically possible, would be a labor-intensive and economically unreasonable requirement.⁵

For all these reasons, the Commission should require that carriers provide only toll blocking service to Lifeline customers, where technically available, and eliminate any requirement to offer toll control.

Respectfully Submitted,



Lawrence W. Katz

Edward D. Young, III
Betsy L. Roe
Of Counsel

1320 North Court House Road
8th Floor
Arlington, Virginia 22201
(703) 974-4862

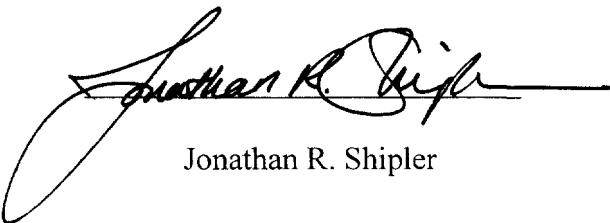
Attorney for the Bell Atlantic
Telephone Companies

September 3, 1997

⁵ A recent Commission decision would even eliminate Bell Atlantic's ability to track the rates of interexchange carriers for which it does not provide billing services. The Commission not only detariffed non-dominant interexchange carrier services but reversed its previous requirement that carriers must disclose their toll rates publicly. ***Policy and Rules Concerning the Interstate, Interexchange Marketplace***, CC Docket No. 96-61, FCC 97-293, ¶ 69 (rel. Aug. 20, 1997). Therefore, there may be no available source of rate information that Bell Atlantic could use to determine when a Lifeline customer reaches a pre-set dollar limit.

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of September, 1997, a copy of the foregoing
**“REPLY OF BELL ATLANTIC TO OPPOSITIONS TO PETITIONS FOR
RECONSIDERATION”** was served by first class U.S. mail, postage prepaid, on the parties
listed on the attached service list.



Jonathan R. Shipler

* BY HAND

ITS, Inc.*
1919 M Street, NW
Room 246
Washington, DC 20554

Gail Polivy
1850 M Street, NW
Suite 1200
Washington, DC 20036

Richard McKenna, HQE03J36
GTE Service Corp.
P.O. Box 152092
Irving, TX 75015-2092

Susan Gately
Helen Golding
Joeseeph Laszlo
Economics and Technology, Inc.
One Washington Mall
Boston, MA 02108-2617

James Blaszak
Kevin S. DiLallo
Levine, Blaszak, Block & Boothby, LLP
1300 Connecticut Avenue, NW
Suite 500
Washington, DC 20036-1703

Kathleen Q. Abernathy
David A. Gross
AirTouch Communications, Inc.
1818 N Street, NW
Washington, DC 20036

Charles D. Cosson
Lynn Van Housen
AirTouch Communications, Inc.
One California Street, 29th Floor
San Francisco, CA 94111

Michael J. Karson
Ameritech
2000 West Ameritech Center Drive
Room 4H88
Hoffman Estates, IL 60196-1025

M. Robert Sutherland
Richard M. Sbaratta
BellSouth Corp.
BellSouth Telecommunications, Inc.
Suite 1700
1155 Peachtree Street, NE
Atlanta, GA 30309-3610

Mark C. Rosenblum
Peter H. Jacoby
Judy Sello
AT&T Corp.
Room 324511
295 North Maple Avenue
Basking Ridge, NJ 07920

Randall S. Coleman
Michael F. Altschul
CTIA
1250 Connecticut Avenue, NW
Suite 200
Washington, DC 20036

Christopher W. Savage
Cole, Raywid & Braveman, LLP
1919 Pennsylvania Avenue, NW
Suite 200
Washington, DC 20006

Kathy L. Shobert
General Communications, Inc.
901 15th Street, NW
Suite 900
Washington, DC 20005

Sue Blumenfeld
Michael G. Jones
Jennifer Desmond McCarthy
Willkie Farr & Gallagher
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20036

Henry D. Levine
Laura F.H. McDonald
Levine, Blaszak, Block & Boothby, LLP
1300 Connecticut Avenue, NW
Suite 500
Washington, DC 20036-1703

Mark J. Golden
Robert L. Hoggarth
Angela F. Giancarlo
PCIA
500 Montgomery Street
Suite 700
Alexandria, VA 22314-1561

Anne U. MacClintock
Southern New England Telephone Co.
227 Church Street
New Haven, CT 06510

Jay C. Keithley
Leon M. Kestenbaum
Norina T. Moy
Sprint Corp.
1850 M Street, NW
Suite 1100
Washington, DC 20036

Craig T. Smith
Sprint Corp.
P.O. Box 11315
Kansas City, MO 64112

Kevin J. Kelley
TCA, Inc.
3617 Betty Drive, Suite I
Colorado Springs, CO 80917

Charles C. Hunter
Catherine M. Hannan
Hunter Communications Law Group
1620 I Street, NW
Suite 701
Washington, DC 20006

Mary J. Sisak
Mary L. Brown
MCI Telecommunications Corp.
1801 Pennsylvania Avenue, NW
Washington, DC 20006

Kevin Gallagher
360 Communications Co.
8725 W. Higgins Road
Chicago, IL 60631

Lori A. Dolqueist
Angela J. Campbell
Institute for Public Representation
Georgetown University Law Center
600 New Jersey Avenue, NW
Washington, DC 20001

Katherine Grincewich
Office of the General Counsel
United States Catholic Conference
3211 4th Street, NW
Washington, DC 20017-1194

Mary McDermott
Linda Kent
Keith Townsend
Hance Haney
USTA
1401 H Street, NW
Suite 600
Washington, DC 20554

David L. Sharp
Virgin Island Telephone Co.
P.O. Box 6100
St. Thomas, US Virginia Islands 00801-6100

Robert M. Halperin
Crowell & Moring, LLP
1001 Pennsylvania Avenue, NW
Washington, DC 20004

Bruce D. Jacobs
Glenn S. Richards
Stephen J. Berman
Fisher Wayland Cooper Leader & Zaragoza
LLP
2001 Pennsylvania Avenue, NW
Suite 400
Washington, DC 20006

Lon C. Levine
AMSC Subsidiary Corp.
10802 Park Ridge Boulevard
Reston, VA 22091

Alan R. Shark
AMTA
1150 18th Street, NW
Suite 250
Washington, DC 20036

Raymond G. Bender, JR.
J.G. Harrington
Dow, Lohnes & Albertson, PLLC
1200 New Hampshire Avenue, NW
Suite 800
Washington, DC 20036-6802

Peter A. Rohrbach
David L. Sieradzki
Cindy D. Jackson
Hogan & Hartson, LLP
555 13th Street, NW
Washington, DC 20004

Philip V. Otero
GE American Communications, Inc.
Four Research Way
Princeton, NJ 08540

David A. Beckett
Office of the Attorney General
1525 Sherman Street
5th Floor
Denver, CO 80203

Herbert E. Marks
James M. Fink
Squire, Sanders & Dempsey, LLP
1201 Pennsylvania Avenue, NW
P.O. Box 407
Washington, DC 20044

Kathryn Matayoshi
State of Hawaii
Division of Consumer Advocacy
Dept. of Commerce and Consumer Affairs
250 South King Street
Honolulu, HI 96813

Daniel S. Goldberg
W. Kenneth Ferree
Goldberg, Godles, Weiner & Wright
1229 19th Street, NW
Washington, DC 20036

Margot S. Humphrey
Koteen & Naftalin, LLP
1150 Connecticut Avenue, NW
Suite 1000
Washington, DC 20036

David Cosson
L. Marie Guillory
2626 Pennsylvania Avenue, NW
Washington, DC 20037

Lisa M. Zaina
Stuart Polikoff
21 Dupont Circle, NW
Suite 700
Washington, DC 20036

David R. Poe
Catherine P. McCarthy
LeBoeuf, Lamb, Greene & MacRae LLP
1875 Connecticut Avenue, NW
Suite 1200
Washington, DC 20009

Paul B. Jones
Janis Stahlhut
Donald F. Shephard
Time Warner Communications Holdings, Inc
290 Harbor Drive
Stamford, CT 06902

Robert B. McKenna
John L. Traylor
U S West, Inc.
Suite 700
1020 19th Street, NW
Washington, DC 20036